

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES SECURITIES AND  
EXCHANGE COMMISSION,

Plaintiff,

vs.

STEFAN QIN, VIRGIL TECHNOLOGIES  
LLC, MONTGOMERY TECHNOLOGIES  
LLC, VIRGIL QUANTITATIVE  
RESEARCH, LLC, VIRGIL CAPITAL LLC,  
and VQR PARTNERS LLC,

Defendants.

Case No.: 20-cv-10849 (LGS)

**NOTICE OF RECEIVER'S MOTION FOR AN ORDER APPROVING THE  
RETENTION OF MILLER KAPLAN ARASE, LLP**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law and upon all the prior pleadings and proceedings herein, Robert A. Musiala, Jr., the Court-appointed Receiver in the above-captioned case (the "Receiver"), by and through his counsel, moves this Court, before the Honorable Lorna G. Schofield, United States District Judge for the Southern District of New York, at the United States District Court for the Southern District of New York, 40 Foley Square, New York, New York 10007, for an order granting the Receiver's Motion for Approval to Retain Miller Kaplan Arase, LLP to provide tax and consulting services, together with such other and further relief as this Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that this Motion is made with the consent of Plaintiff. The Receiver respectfully requests that this Motion be decided on an expedited basis.

Dated: August 17, 2022  
New York, New York

**BAKER & HOSTETLER LLP**

/s/ Teresa Goody Guillén  
1050 Connecticut Avenue, NW  
Suite 1100  
Washington, D.C. 20036  
Tel.: (202) 861-1500  
Facsimile: (202) 861-1783  
Teresa Goody Guillén  
[tgoodyguillen@bakerlaw.com](mailto:tgoodyguillen@bakerlaw.com)

45 Rockefeller Plaza  
New York, NY 10111-0100  
Tel.: (212) 589-4200  
Facsimile: (212) 589-4201  
Marco Molina  
[mmolina@bakerlaw.com](mailto:mmolina@bakerlaw.com)  
Bari R. Nadworny  
[bnadworny@bakerlaw.com](mailto:bnadworny@bakerlaw.com)

*Attorneys for Receiver Robert A. Musiala, Jr.*